

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

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In re: Case No. 2-19-20905-PRW  
The Diocese of Rochester, Chapter 11  
Debtor.

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**INTERSTATE FIRE AND CASUALTY COMPANY AND NATIONAL SURETY  
CORPORATION'S RESPONSE TO COMMITTEE'S MOTION TO DEPOSE BISHOP  
EMERITUS MATTHEW HARVEY CLARK**

Interstate Fire and Casualty Company (“Interstate”) and National Surety Corporation (“NSC” and, together with Interstate, the “IFC/NSC Insurers”), by and through undersigned counsel, file this limited response to the Official Committee of Unsecured Creditors’s Motion pursuant to Federal Rule of Bankruptcy Procedure 2004 for permission to depose Bishop Emeritus Matthew Harvey Clark [Docket No. 380]:

The IFC/NSC Insurers hereby join in the Limited Response to the Motion filed by London Market Insurers (“LMI”). Like LMI, the IFC/NSC Insurers are parties to the mediation process. If Bishop Clark’s deposition proceeds, the IFC/NSC Insurers should have an equal opportunity to obtain information relevant to the mediation process by fully participating in the deposition.

**CONCLUSION**

WHEREFORE, the IFC/NSC Insurers respectfully request an opportunity to participate in the deposition of Bishop Emeritus Clark, if this Court grants the Motion.

Dated: Minneapolis, MN.  
February 6, 2020

Respectfully submitted,  
MOSS & BARNETT, P.A.

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